

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

RICARDO R. GARCIA, DUANE K. GLOVER,) CASE NO.: 1:19-cv-00331-LO-MSN
PAUL E. JACOBSON, GAETANO CALISE,)
MYKHAYLO I. HOLOVATYUK, BRIAN)
GARCIA, PAUL THOMSON, and DAVID)
HARTMAN, on behalf of themselves and all)
others similarly situated,)
)
Plaintiffs,)
)
v.)
)
VOLKSWAGEN GROUP OF AMERICA, INC.)
a/k/a AUDI OF AMERICA, INC., and)
VOLKSWAGEN AKTIENGESELLSCHAFT,)
)
Defendants.)
)

PLAINTIFFS' MOTION TO COMPEL DEFENDANT VOLKSWAGEN GROUP OF AMERICA, INC.'S DISCOVERY RESPONSES AND DOCUMENT PRODUCTION

Plaintiffs Ricardo R. Garcia *et al.* respectfully submit this Motion to Compel Defendant Volkswagen Group of America, Inc.’s (“VWGOA’s”) Discovery Responses and Document Production pursuant to Fed. R. Civ. P. 26(b)(1) and 37(a)(3)(B)(iii)-(iv). For the reasons set forth more fully in Plaintiffs’ Memorandum in Support of its Motion to Compel and as shown in the accompanying Declaration of Counsel and Exhibits thereto, the Court should grant Plaintiffs’ Motion and compel Defendant VWGOA to provide the discovery responses and document productions set forth therein.

Plaintiffs state that they have met and conferred in good faith with Defendant VWGOA in an effort to resolve these disputes without Court intervention. *See* Fed. R. Civ. P. 37(a)(1); E.D. Va. L.R. 37(A).

Dated: February 18, 2021

Respectfully submitted,

/s/ Michael J. Melkersen

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Attorneys for Plaintiffs and Interim Class Counsel

CERTIFICATE OF SERVICE

I, Michael J. Melkersen, hereby certify that on this date I served a true and correct copy of the foregoing Motion to Compel upon counsel of record for Defendants by filing via the Court's Electronic Case Filing (ECF) system.

Dated: February 18, 2021

/s/ Michael J. Melkersen
Michael J. Melkersen